

# **EXHIBIT B**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

SUSAN B. LONG, ET AL.,	)	
	)	
Plaintiffs,	)	
	)	CV No. 17-1097
vs.	)	Washington, D.C.
	)	May 27, 2021
IMMIGRATION	)	10:03 a.m.
AND CUSTOMS ENFORCEMENT, ET AL.,	)	
	)	
Defendants.	)	
_____	)	

TRANSCRIPT OF EVIDENTIARY HEARING VIA ZOOM PROCEEDINGS  
BEFORE THE HONORABLE AMIT P. MEHTA  
UNITED STATES DISTRICT JUDGE

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<u>WITNESSES</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
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DEFENDANT'S:

TIMOTHY GIBNEY	13	92		
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<u>WITNESSES</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
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GOVERNMENT'S:

TIMOTHY GIBNEY			131	
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<u>WITNESSES</u>	<u>DIRECT</u>	<u>CROSS</u>	<u>REDIRECT</u>	<u>RECROSS</u>
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PLAINTIFF's:

SUSAN B. LONG	137	161		
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1 warehouse system, IIDS, which we use for all types of  
2 reporting and analytics and any type of query purposes. So  
3 that's where the requests are -- FOIA request data for  
4 operational data ultimately comes out of the IIDS. But the  
5 data itself is created in the EID, sourced from EID.

6 Q So where does the agency search for records that  
7 would respond to a FOIA request like TRAC's request?

8 A Right.

9 So we search for those records in our -- in  
10 artifacts that are deliverable which were created out of  
11 IIDS.

12 Q So if I understand correctly, the data originates  
13 in the EID --

14 A Correct.

15 Q -- which is the system of record, correct?

16 A Yes.

17 Q And then you just mentioned that searches are done  
18 through IIDS; is that right?

19 A That's correct, yes.

20 Q Can you explain how that data gets from the EID  
21 into the IIDS?

22 A Sure.

23 So we follow an ETL process, which is extract,  
24 transform, load. This is a standard process that you use to  
25 move data from a transactional system such as EID to a

1 reporting system.

2 So we do this process three times a week, where we  
3 completely rebuild our reporting database based on the  
4 current EID data. So we run this process three times a week  
5 to have a reporting repository available so that we can  
6 answer questions about the EID operational data.

7 Q So the ETL is kind of a conduit, a go-between,  
8 from EID to IIDS?

9 A Yeah, the ETL is a process. So it does three  
10 things. It extracts.

11 So data in EID is transactional data, it's not  
12 stored in a way which is intended for reporting. It's  
13 very -- it's a normalized database, it's not structured in a  
14 way that makes reporting easy.

15 So this is pretty standard. What you do is you  
16 then have a data warehouse, which has a completely different  
17 type of data structure that is more amenable toward  
18 reporting.

19 So the ETL doesn't extract. Three times a week,  
20 we go in and we pull all the relevant EID data. We  
21 transform it. That's the "T" in the ETL. So we reorganize  
22 it, we add calculations to get commonly requested items  
23 pre-canned and ready to go.

24 And then we load it. That's the "L." So that's  
25 where it actually then gets loaded into the IIDS data model.